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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF OREGON

12 In re
13 Van's Aircraft, Inc.,
14 Debtor.
15
16

Case No. 23-62260-dwh11

**STIPULATED MOTION FOR ENTRY
OF STIPULATED ORDER
EXTENDING DEADLINE TO OBJECT
TO CLAIM NO. 572 (VAN'S
AIRCRAFT, INC. EMPLOYEE STOCK
OWNERSHIP PLAN)**

17 Van's Aircraft, Inc. ("Van's") and the Van's Aircraft, Inc. Employee Stock Ownership
18 Plan ("ESOP") move this Court for entry of a stipulated order extending the deadline for Van's
19 to object to Claim No. 572 of the ESOP ("ESOP Claim") to April 30, 2025, as set forth below,
20 and state as follows:

21 1. The Court entered its Order Confirming Debtor's Plan of Reorganization Pursuant
22 to 11 U.S.C. § 1191(b) [ECF No. 143] on May 16, 2024 ("Plan"). The Plan became effective on
23 June 1, 2024 ("Effective Date").

24 2. Pursuant to Article 7.1 of the Plan, unless otherwise ordered by this Court, all
25 objections to Claims and Scheduled Amounts (other than Administrative Expense Claims) are to
26

1 be filed with the Court and served upon the holder of the Claim objected to on or before 60 days
2 after the Effective Date, which deadline is July 31, 2024 ("Claim Objection Deadline").

3 3. The Court entered a Stipulated Order on July 30, 2024 [ECF No. 155], granting
4 the parties' first Stipulated Motion for Entry of Stipulated Order Extending Deadline to Object to
5 Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership Plan) [ECF No. 154], which
6 extended the claim objection deadline, as it pertains to Claim No. 572, to September 30, 2024.

7 4. The Court entered a Stipulated Order on October 1, 2024 [ECF No. 612], granting
8 the parties' second Stipulated Motion for Entry of Stipulated Order Extending Deadline to
9 Object to Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership Plan) [ECF No. 609],
10 which extended the claim objection deadline, as it pertains to Claim No. 572, to November 30,
11 2024.

12 5. The Court entered a Stipulated Order on November 27, 2024 [ECF No. 694],
13 granting the parties' third Stipulated Motion for Entry of Stipulated Order Extending Deadline to
14 Object to Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership Plan) [ECF No. 609],
15 which extended the claim objection deadline, as it pertains to Claim No. 572, to February 28,
16 2025.

17 6. Van's and the ESOP have been working diligently to wrap up the termination
18 process for the ESOP, including finalizing distributions. The parties expect the process is close
19 to completion, but desire additional time to complete the process.

20 7. Van's certifies that, for the reasons set forth herein, the requested extension is in
21 good faith, Van's appropriately used the prior time, and that the continuance is being requested
22 at the earliest time practical. Van's and the ESOP have agreed to stipulate to an extension of the
23 Claim Objection Deadline, as it pertains to the ESOP Claim, to April 30, 2025.

24 8. Attached hereto as **Exhibit 1** is a proposed Stipulated Order Extending Deadline
25 to Object to Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership Plan).
26

1 WHEREFORE, Van's and the ESOP pray this Court enter the Stipulated Order
2 Extending Deadline to Object to Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership
3 Plan).

4 DATED: February 21, 2025.

5 TONKON TORP LLP

6 By /s/ Timothy J. Conway

7 Timothy J. Conway, OSB No. 851752
8 Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

9 IT IS SO STIPULATED:

10 TONKON TORP LLP

SUSSMAN SHANK LLP

11 By /s/ Timothy J. Conway

12 Timothy J. Conway, OSB No. 851752
13 Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

By /s/ Christopher Coyle

Christopher Coyle, OSB No. 073501
Attorney for Van's Aircraft, Inc.
Employee Stock Ownership Plan

EXHIBIT 1

Proposed Form of Stipulated Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Van's Aircraft, Inc.,

Debtor.

Case No. 23-62260-dwh11

**STIPULATED ORDER EXTENDING
DEADLINE TO OBJECT TO CLAIM
NO. 572 (VAN'S AIRCRAFT, INC.
EMPLOYEE STOCK OWNERSHIP
PLAN)**

THIS MATTER having come before the Court upon the Stipulated Motion for Entry of Stipulated Order Extending Deadline to Object to Claim No. 572 (Van's Aircraft, Inc. Employee Stock Ownership Plan) [ECF No. ____] ("Motion"), and the Court having reviewed the Motion and otherwise being duly advised in the premises; NOW, THEREFORE,

IT IS HEREBY ORDERED that the deadline for Van's Aircraft, Inc. to object to Claim No. 572 of the Van's Aircraft, Inc. Employee Stock Ownership Plan is extended to April 30, 2025.

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By _____
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IT IS SO STIPULATED:

TONKON TORP LLP

SUSSMAN SHANK LLP

By _____
Timothy J. Conway, OSB No. 851752
Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

By _____
Christopher Coyle, OSB No. 073501
Attorney for Van's Aircraft, Inc.
Employee Stock Ownership Plan

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **STIPULATED MOTION FOR ENTRY OF STIPULATED ORDER EXTENDING DEADLINE TO OBJECT TO CLAIM NO. 572 (VAN'S AIRCRAFT, INC. EMPLOYEE STOCK OWNERSHIP PLAN)** was served on Debtor and the parties indicated as "ECF" on the attached List of Interested Parties by electronic means through the Court's Case Management/Electronic Case File system on the date set forth below.

DATED: February 21, 2025.

TONKON TORP LLP

By /s/ Timothy J. Conway

Timothy J. Conway, OSB No. 851752
Michael W. Fletcher, OSB No. 010448
Ava Schoen, OSB No. 044072
Attorneys for Debtor

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